

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>Criminal No. 11-186-S</b>
<b>v.</b>	)	
	)	
<b>JOSEPH CARAMADRE</b>	)	
	)	
<b>and</b>	)	
	)	
<b>RAYMOUR RADHAKRISHNAN</b>	)	
	)	
<b>Defendants.</b>	)	

**MOTION OF UNITED STATES TO DISQUALIFY  
COUNSEL BASED ON CONFLICT OF INTEREST**

Comes now the United States of America, by and through its attorneys, Peter F. Neronha, United States Attorney, Lee H. Vilker and John P. McAdams, Assistant United States Attorneys, and hereby moves this Court, for the reasons provided in the accompanying Memorandum of Law, to disqualify attorney Antony Traini from representing defendant Joseph Caramadre due to an unwaivable conflict of interest.

Respectfully submitted,

PETER F. NERONHA  
UNITED STATES ATTORNEY

/s/ Lee H. Vilker  
LEE H. VILKER  
Assistant U.S. Attorney

JOHN P. MCADAMS  
Assistant U.S. Attorney  
U.S. Attorney's Office  
50 Kennedy Plaza, 8th Floor  
Providence, RI 02903

**CERTIFICATE OF SERVICE**

I, hereby certify that on this 18<sup>th</sup> day of June, 2012, I caused the within Government's Notice of Motion to be served via the Court's Electronic Filing System on:

**For Joseph Caramadre:**

Michael J. Lepizzera, Esq.  
James T. McCormack, Esq.  
Anthony Traini, Esq.

**For Raymour Radhakrishnan:**

Olin Thompson, Esq.

/s/ John P. McAdams  
John P. McAdams  
Assistant U.S. Attorney  
United States Attorney's Office  
50 Kennedy Plaza, 8<sup>th</sup> Floor  
Providence, RI 02903